

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROXANNE DAWSON, individually and on behalf
of all persons similarly situated,

Plaintiff,

-against-

STUDENT LOAN SOLUTIONS, LLC and
ROACH & MURTHA ATTORNEYS AT LAW,
P.C.,

Defendants.

No. 23 Civ. 9690 (MKV)

Oral Argument Requested

**NOTICE OF MOTION BY PLAINTIFF FOR CLASS CERTIFICATION AND
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff respectfully moves this Court for an order granting certification of a class pursuant to Rules (b)(2) and (b)(3) of the Federal Rules of Civil Procedure, consisting of:

All individuals whom Student Loan Solutions sued to collect on a student loan that Student Loan Solutions purchased from Bank of America on October 31, 2017 and purported to accelerate.

Plaintiff further respectfully moves this Court for an order granting summary judgment on Plaintiff's claims under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* and New York General Business Law § 349, and such other and further relief as the Court deems just and proper.

In support of this omnibus motion, Plaintiff submits the accompanying Memorandum of Law in Support of Plaintiff's Motion for Class Certification and Summary Judgment; the declarations of Jessica Ranucci, dated January 14, 2025, and Roxanne Dawson, dated January

10, 2025, and all exhibits and attachments thereto; and Plaintiff's Local Civil Rule 56.1

Statement of Material Facts as to Which There Is No Genuine Issue To Be Tried file herewith.

Date of Service: January 15, 2025

/s/ Jessica Ranucci

Jessica Ranucci
Danielle Tarantolo
NEW YORK LEGAL ASSISTANCE GROUP
100 Pearl Street, 19th Floor
New York, NY 10004
(212) 613-7578
jranucci@nylag.org

Counsel for Plaintiff